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** Admitted in N.Y. and N.J.*

May 1, 2020

Vernon S. Broderick, U.S. District Judge
United States District Court S.D.N.Y.
Thurgood Marshall United States Courthouse
40 Foley Square, Room 415
New York, NY 10007

Re: Juan Velazquez v. Stephen Einstein & Associates, P.C. Case No. 1:20-CV-01559-VSB

Dear Judge Broderick:

My office is the Defendant in the above-referenced action. I write on consent to request that Defendant's deadline to answer the Complaint in this action be extended to May 30, 2020.

In accordance with Your Honor's Individual Practice Rule 1(G), I further advise the Court as follows:

- 1- The original date to answer the Complaint was March 28, 2020. Defendant previously requested, on consent, to extend the original deadline to April 30, 2020. ECF Doc 5. That previous request has not yet been ruled on by the Court.
- 2- Plaintiff has consented to Defendant's request to further extend the deadline to May 30, 2020 on condition that Defendant request no further extensions.
- 3- Defendant has requested an extension of time to answer the Complaint because of the adverse effect the Covid-19 pandemic has had on Defendant's law practice.
- 4- The requested second extension of time does not impact any other deadlines in this matter.

The parties are actively discussing settlement and may be able to resolve the case prior to the requested May 30, 2020 deadline.

Respectfully,

/s/ Anthony S. Poulin
Anthony Poulin, Esq.
AP9331

cc: Daniel A. Schlanger, Esq.